

REMARKS

In response to the Final Office Action mailed on May 11, 2007, the Applicants sincerely request reconsideration in view of the above amendments to the claims and the following remarks. The claims as presented are believed to be in allowable condition.

Claims 1 and 4-18 are currently pending in the present application and are rejected under 35 U.S.C. § 103. Claims 1, 4-11, 14, 16, and 17 have been amended to further clarify the subject matter and correct minor informalities. Claims 12 and 13 have been cancelled without disclaimer or prejudice. No new matter is added by the amendments.

Claim Rejections Under 35 U.S.C. §103

Claims 1 and 4-18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2003/0014447 to White (hereinafter *White*), in view of U.S. Patent No. 6,580,438 to Ichimura, *et al.* (hereinafter *Ichimura*) and in further view of U.S. Publication No. 2003/0030645 to Ribak, *et al.* (hereinafter *Ribak*). Applicants respectfully traverse the rejections.

Applicants' claim 1 recites a method for formatting objects in a page of an electronic document that includes, *inter alia*, "receiving a first instance of an object as an input for the page in the electronic document, wherein the page is associated with a style sheet", "receiving formatting information associated with the first instance of the object", "setting formatting parameters for the first instance of the object in the page and in the style sheet based on the received formatting information", "receiving another instance of the object an input for the page in the electronic document", "determining a format for the other instance of the object based on the position of the first instance of the object in the style sheet", and "applying the format to the other instance of the object, wherein the format includes at least one from a set of: a font, an indent position, a line spacing, a bullet style, a numbering style, a text flow around graphics, a color transparency of graphics, a horizontal placement of graphics, and a scaling of graphics

relative to an absolute size of the graphics.” The amendments are supported by the Specification (Specification pages 2-5, 17-20). Among other differences, *White*, *Ichimura*, and *Ribak* do not anticipate or teach these features of amended claim 1.

White discloses a data management system for generating customized versions of data documents, where the document is initially stored as in the form of raw data, which is subsequently parsed into an internal representation of the document (*White*: Abstract and par. 0009, 0010). According to *White*, a document generator includes a document manager that includes a document table and a transform table. The document table of *White* contains rows of document records that identify and are used to read raw data documents from the raw document database. Similarly, the transform table of *White* contains rows of transform records that identify and are used to read transforms from the transform database (*White*: Fig. 4 and par. 0066). Thus, *White* does not disclose or teach any of the features of Applicants' amended claim 1.

Ribak discloses a method for visualizing data that includes receiving code representing content for display on the screen of a computer, the content including at least one hyperlink to other content and at least one attribute associated with the hyperlink (*Ribak*: Abstract and par. 0013). Specifically, *Ribak* teaches "an element in a document may have multiple hyperlinks of different types, each with its own verbosity characteristic. ... When the formatting styles conflict (as when different colors are used for different hyperlink types, for example), the document is preferably reformatted in order to resolve the conflict" (*Ribak*: Fig. 2A, 2B and par. 0043). According to *Ribak* a document is reformatted when formats conflict between the hyperlinks and the document. Contrary to *Ribak*, an instance of an object (graphic or text) is formatted according to a position of a first instance of an object from a style sheet associated with the electronic document based on calculation of the position of the first instance of the object within the style sheet and comparison of the object's position with a position of the other instance of the object in the electronic document, according to claim 1.

Furthermore, *Ribak* does not even hint “setting formatting parameters for the first instance of the object in the page and in the style sheet based on the received formatting

information” or “applying the format to the other instance of the object, wherein the format includes at least one from a set of: ... a text flow around graphics, a color transparency of graphics, a horizontal placement of graphics, and a scaling of graphics relative to an absolute size of the graphics.” Thus, *Ribak* not only fails to teach or suggest features of amended claim 1 individually or in combination with the *White*, but *Ribak* also teaches away from the claimed invention by suggesting the document be preferably reformatted in order to resolve a conflict between styles of an input and the document.

Ichimura discloses methods and systems to manipulate presentation elements to create a unified display characteristic between the elements selected for presentation (*Ichimura*: Abstract; col. 2, lines 1-6). While *Ichimura* describes “[a] stylizer replaces the attributes of tags with the new attributes that correspond to the selected style”, *Ichimura* also discloses “[t]he stylizer applies the selected or custom style to the presentation element with the cooperation of controller. In particular, the stylizer compares the detected presentation element type to a presentation element attribute table...” (emphasis added) (*Ichimura*: col. 6, lines 30-34). Use of an attribute table is significantly different and distinct from determining a format for the other instance of the object based on the position of the first instance of the object in the style sheet as recited by the amended claim 1. Moreover, *Ichimura* describes “the presentation element type identifier in conjunction with the controller determines if a style has previously been associated with the selected presentation element. If an associated style ... is not available, the stylizer in conjunction with the presentation element type identifier analyzes the presentation element to create a style based on that presentation element's display characteristics (*Ichimura*: col. 12, lines 12-20). Thus, *Ichimura* teaches away from Applicant's amended claim 1.

Furthermore, *Ichimura* also fails to disclose or suggest “setting formatting parameters for the first instance of the object in the page and in the style sheet based on the received formatting information” or “applying the format to the other instance of the object, wherein the format includes at least one from a set of: ... a text flow around graphics, a color transparency of

graphics, a horizontal placement of graphics, and a scaling of graphics relative to an absolute size of the graphics.”

Thus, *White*, *Ribak*, and *Ichimura*, alone or in combination, fail to teach or suggest features of amended claim 1. Therefore, claim 1 is allowable. Claims 4-8 and 18 depend from independent claim 1 and are thus allowable for at least the same reasons discussed above with respect to claim 1. Notice to that effect is respectfully requested.

Applicants' amended claim 9 recites a method for controlling page formatting of an electronic document that includes similar features to the method of amended claim 1 such as “receiving a first instance of an object as an input for the page in the electronic document, wherein the page is associated with a style sheet”, “receiving formatting information associated with the first instance of the object”, “setting formatting parameters for the first instance of the object in the page and in the style sheet based on the received formatting information”, “determining a format for the other instance of the object based on the position of the first instance of the object in the style sheet, wherein the format for a graphics object includes at least one from a set of: a text flow around graphics, a color transparency of graphics, a horizontal placement of graphics, and a scaling of graphics relative to an absolute size of the graphics, and wherein the format for a text object includes at least one from a set of: a font, an indent position, a line spacing, a paragraph alignment, a bullet style, and a numbering style determined based on a language identifier of the other instance of the object and a corresponding language identifier of the first instance of the object in the style sheet”, and “applying the format to the other instance of the object.”

As discussed above in more detail, *White*, *Ichimura*, and *Ribak*, individually or in combination, do not teach or suggest at least the setting formatting parameters for the first instance of the object in the page and in the style sheet based on the received formatting information, and determining a format for the other instance of the object based on the position of the first instance of the object in the style sheet, wherein the format for a graphics object includes at least one from a set of: a text flow around graphics, a color transparency of graphics,

a horizontal placement of graphics, and a scaling of graphics relative to an absolute size of the graphics, and wherein the format for a text object includes at least one from a set of: a font, an indent position, a line spacing, a paragraph alignment, a bullet style, and a numbering style determined based on a language identifier of the other instance of the object and a corresponding language identifier of the first instance of the object in the style sheet features of amended claim 9. Claim 9 and its dependent claims 10 and 11 are, therefore in condition for allowance. Notice to that effect is respectfully requested. Claims 12 and 13 have been canceled without disclaimer or prejudice.

Applicants' amended claim 14 recites computer system for creating object in an electronic document that includes a program module with instructions for "monitoring a position of an instance of an object within an electronic document", "comparing the instance of the object to a style sheet for controlling a format of the electronic document based on first instances of one or more objects within the style sheet with predefined formatting, wherein a position and a type of a first instance of an object in the style sheet is used to determine a format to be applied to the instance of the object for consistency of the format of the electronic document", and "formatting the instance of the object within the electronic document in response to identifying the format in the style sheet based on the corresponding position of the identified first instance of the object in the style sheet relative to the position of the instance of the object in the electronic document."

As discussed above, *White*, *Ichimura*, and *Ribak*, individually or in combination, do not teach or suggest several features of claim 14 similar to claims 1 and 9. Claim 14 and its dependent claims 15-17 are, therefore in condition for allowance. Notice to that effect is respectfully requested.

CONCLUSION

In response to the Final Office Action dated May 11, 2007, this Response is being filed together with a Request for Continued Examination. For at least the aforementioned reasons, the Applicants assert that the pending claims are in condition for allowance. The Applicants further assert that this response addresses each and every point of the Office Action, and respectfully requests that the Examiner pass this application to allowance. If the Examiner has any questions or comments concerning this matter, the Examiner is invited to contact the applicant's undersigned attorney at the number below.

Please charge any additional fees or credit any overpayment to Deposit Account No. 13-2725.

Respectfully submitted,

MERCHANT & GOULD, LLC



Date: August 13, 2007

Carl K. Turk
Reg. No. 59,675

MERCHANT & GOULD, LLC
P.O. Box 2903
Minneapolis, Minnesota 55402-0903
(404) 954-5100 (Main)
(404) 954-5099 (Fax)

